

UNITED STATES DISTRICT COURT

for the

SOUTHERN District of THE STATE OF NEW YORK

Division

Tyre Fred Newsome Sr.

Case No. _____

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

See Attached

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Tyre Fred Newsome		
Address	66 St Nicholas Place 47a		
	New York	NY	10032
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Manhattan		
Telephone Number	3475598701		
E-Mail Address	sweetbroadwayprime@gmail.com		

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name	Pamela Scheininger		
Job or Title <i>(if known)</i>	Court Attorney Referee		
Address	60 Lafayette Street		
	New York	Ny	10013
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Manhattan		
Telephone Number	6463865200		
E-Mail Address <i>(if known)</i>			
<input checked="" type="checkbox"/> Individual capacity <input type="checkbox"/> Official capacity			

Defendant No. 2

Name	The New York City Family Courts		
Job or Title <i>(if known)</i>			
Address	60 Lafayette Street		
	New York	NY	10032
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Manhattan		
Telephone Number	6463865200		
E-Mail Address <i>(if known)</i>			
<input type="checkbox"/> Individual capacity <input checked="" type="checkbox"/> Official capacity			

Defendant No. 3

Name The State of New York

Job or Title *(if known)*

Address State Street and Washington Avenue

Albany NY 12224

City State Zip Code

County

Telephone Number

E-Mail Address *(if known)*

☐ Individual capacity ☒ Official capacity

Defendant No. 4

Name The New York City Department Of Corrections

Job or Title *(if known)*

Address 75-20 ASTORIA BLVD

EAST ELMHURST NY 11370

City State Zip Code

County QUEENS

Telephone Number

E-Mail Address *(if known)*

☐ Individual capacity ☒ Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against *(check all that apply)*:

☐ Federal officials (a *Bivens* claim)

☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials? I am being deprived of the 1st, 2nd, 4th, 5th, 6th, 7th, 8th, 9th, 10th, 13th, 14th, amendments to the US Constitution. I have suffered false arrest, malicious prosecution, abuse of power and process. I am suffering under a bill of attainder, or bill of pains and punishments as I am being punished without being found guilty of a crime in a jury trial. I have suffered invasion of privacy, intrusion upon seclusion, and making the private public. I was denied access to an open court as court was via telephone.

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

- D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.
- Pamela Scheininger/referee acting without my consent issued 5 years protective orders, and custody orders that are depriving me of fundamental human rights, civil rights, and due process under color of the family court act. The officers from the NYPD have arrested me 3 times enforcing the coram non judice orders. Each arrest constitutes a separate deprivation of my right against unreasonable search and seizure. The orders violate my right to a trial by jury in criminal prosecutions or civil prosecutions where the value exceeds \$20.

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?
- Pamela Scheininger a referee with NYC Family Court with no jurisdiction outside of my consent issued fraudulent orders of protection for five years without clear and convincing evidence as to why attempting to disallow me access to my own children. Then I was arrested on 8/23/2023 at 3240 Netherlands Ave in the Bronx, and on 5/14/ 2024 I was arrested twice at my home 66 St. Nicholas Place in Manhattan and at 100 Centre Street in Manhattan, by detectives from the Bronx. Each arrest was carried out without warrant or probable cause constituting a rights deprivation.
- B. What date and approximate time did the events giving rise to your claim(s) occur?
- October 22, 2022 The unlawful order was signed by Pamela Scheinger
 August 27, 2023 mid afternoon I was arrested for violating the orders of protection and charged with Criminal contempt.
 May 14, 2024 6:00 am I was arrested at my home by officers claiming to have a warrant although they did not and they charged me with Criminal Contempt and Child endangerment
- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)
- I have been deprived of fundamental constitutional rights by the actions of Pamela Scheininger. Pamelas Scheininger is a referee in the family court allowed to hear cases on a consent basis. I never gave consent to have my case heard by her in family court, in fact I objected to the proceeding and withdrew consent verbally. So in what appears to be retaliation she issued a 5year order of protection against me without due process depriving me of fundamental liberties like the ability to see my children. That order has led to me being arrested on two separate occasions for simply speaking with my own offspring. The separation caused by years of absence is so painful and hurtful. On August, 27 2023 Officers Lavigat, and Pepdjonovic while acting under color of law arrested me while other officers failed to intervene and prevent my warrantless arrest, and detention at the Bronx central bookings. These officers were enforcing the coram non judice order issued by Pamela Scheininger referee in Family Court. Family court claims I committed penal offenses that justify the issuance of the orders, but I have not been convicted of any crimes relating to family offenses.

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

I have suffered tremendous emotional and mental anguish over the sudden and unexpected removal of my offspring from my existence. I have not been able to focus on anything but trying to get my parental rights back.

I have not been able to work because it takes so much time trying to learn the laws to get a chance to be active in the life of my offspring. I have been having back spasms, and heart palpitations. I have been unable to sleep, and it is very depressing when I wake up to another day without my family. Losing one's offspring changes the entire trajectory and purpose of one's life like very few things could. I have been publically humiliated. I have lost a career as financial service representative that came with prestige and status. I have been forced into living in a homeless shelter for a while because of the false arrests and losing jobs over the false allegations. I have suffered invasion of privacy, intrusion upon seclusion by the NYC Family Court, Pamela Scheininger, and the NYPD. I have suffered cruel and unusual punishment, dehumanization. I have been deprived of the joy of life that came from having my offspring as a daily part of my existence, the pain is indescribable. I am being tortured.

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

I am requesting actual damages of 20,000,000 usd I have lost years of time with my children and been arrested multiple times

I am requesting treble damages of 60,000,000 usd 3x the actual damages

I am requesting punitive damages of 20,0000 usd This is to deter the State of New York, The NYC Family Courts, the NYPD, and the department of corrections from violating the rights of any other citizens in such manner in the future. They have basically violated every right in the bill of rights, and this should not be habitual and routine practice for a state agency or it's agents.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

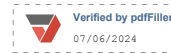
A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 07/06/2024

Signature of Plaintiff

Tyre Newsome

Printed Name of Plaintiff

Tyre Newsome

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address

Addendum

Tyre Newsome

66 St. Nicholas Place 47a

New York, NY 10032

Sweetbroadwayprime@gmail.com

347.559.88701

Tyre Newsome VS

Defendants

- 1.The New York City Family Court
- 2.Pamela Scheininger
3. The State Of New York
4. The City of New York
5. Officer Gutierrez of the 50th precinct in the Bronx badge number 15714
6. Officer Clores, or C. Lores of the 50th precinct in the Bronx badge number 11034
7. Officer Ortega of the 50th precinct in the Bronx badge number 3669
8. Officer Lavigat of the 50th precinct in the Bronx badge number 10878
9. Officer Acevedo of the 50th precinct badge number 5491
10. Officer Pepdjonovic of the 50th in the Bronx precinct badge number 19746
11. Other officers of the NYPD yet be identified and named
12. The New York City Department of Corrections
13. Detective Kareem Anderson of the 50th precinct in the Bronx badge number 6566

Section 2-Additional Pages

2D.)

Pamela Scheininger issued the orders for protection against me naming my offspring TN 07/03/2018 and AN 03/16/2021 although I have never been convicted of any crime involving harming them or anyone else for that matter. The order is cruel and unusual because it seeks to separate me and my family for five years with no plan for reuniting us. The orders are not the least intrusive the government could have proceeded. Considering Patricia Delacruz and were not married, and Mrs. Delacruz is not on public assistance this is a private matter, and the government did not have to take any action. Moreover, Pamela Scheininger abused the process by not dismissing the petition Sua sponte once the petition was not served within six months. Pamela Scheininger was acting under the color of law as NYC Family Court Attorney/Referee.

The NYPD, and officers mentioned and yet to be named were acting under color of law by arresting me, searching, and charging me with criminal contempt, custodial interference, and child endangerment while enforcing the illegal unconstitutional protection orders, and custody orders from Pamela Scheininger and the NYC Family Court.

The NYC Department of Corrections were acting under color of law because they held for arraignment after the false arrest by the NYPD. The Department of Corrections also unlawfully searched and seized me when they took my custody from the NYPD. The NYC Department of Corrections was acting under color of law as an administrative agency in law enforcement.

On 8/27/2023 Officer Gutierrez while in uniform under color of state law witnessed other officers falsely arresting me and failed to intervene at 3240 Netherlands Ave, Bronx New York.

On 8/27/2023 Officer Clores while in uniform under color of state law witnessed other officers falsely arresting me and failed to intervene at 3240 Netherlands Ave, Bronx New York.

On 8/27/ 2023 Officer Ortega while in uniform under color of state law witnessed officers falsely arresting me and failed to intervene.

Officer Lavigat on 8/27/2023 while in uniform under color of state law arrested and searched me without a warrant or witnessing me in commission of a crime enforcing the illegal, unlawful, order of protection issued by Pamela Scheininger and the Family Court. Because of the false arrest based on the Coram Non Judice orders of protection. I have been forced to attend criminal court numerous times before the charges were dismissed and sealed. I was threatened with arrest and a warrant if I did not attend each court date before charges were dismissed causing psychological and emotional distress. I suffered physical injury due to tight handcuffs, mental anguish, fright, shock, trauma and

deprivation of my constitutional rights, among other injuries and deprivations. I suffered genuine fear of being convicted and jailed based defendant's false actions, testimony, and evidence as many other innocent people have. At all times relevant, and arresting, imprisoning, and bringing perjurious charges against me, in subjecting me to humiliating arrests and searches, the individual defendants acted maliciously, intentionally, willfully, negligently, and with reckless disregard for and deliberate indifference to my rights, and physical and mental wellbeing.

Officer Acevedo while in uniform under color of state law witnessed officers falsely arresting me and failed to intervene.

Officer Pepdjonovic while in uniform under color of state law arrested and searched me without a warrant on 8/27/2023

On 5/14/2024 unidentified officers from the NYPD arrested me at home and searched me without a warrant, they were part of a warrant squad, without a uniform acting under color of state law.

The State and city of New York is acting under color law because the City and State of New York authorizes Pamela Scheininger, The NYC Family Courts, The NYC Department of Corrections and the NYPD.

Detective Kareem Anderson then arrested me at 100 Centre Street, the New York criminal courthouse on or about 5/16/2024 without a warrant, I was searched and seized by Detective Anderson before being brought to Bronx Central bookings where I had to sit in a car with my hands cuffed behind my back for nearly three hours waiting to be let into the loading bay at Bronx central booking causing extreme back pain, muscle fatigue and spasms that have lasted for months. Detective Kareem Anderson was acting under color of law.

3. Statement of Claim

I am being deprived of my rights under the first amendment of the US Constitution because I am not being allowed to raise my progeny as I see fit. I am being denied the freedom of expression to communicate with my offspring. I am being denied the care, custody, and control of my offspring. The order of protection and custody order issued by Pamela Scheininger of the NYC Family Court on 10/21/20222 seeks to limit places I can and cannot go, such as my offsprings school, or home, which is depriving me of my freedom of

movement. I am being denied the right to practice my religion as I see fit because part of my religion is to raise my offspring in private, without government interference, regulation, or prohibition. I am being deprived of the right to peacefully assemble with my own family. My interest in my offspring is a fundamental liberty interest and not subject to arbitrary government trespass. The taking of my offspring is a substantive due process violation under my liberty interest under the first amendment. This constitutes a violation of 18 U.S.C. 241, 242, 245 with a kidnapping enhancement. This also constitutes a violation of title 42 section 1983.

I am being deprived of my rights under the second amendment to the US constitution because the order of protection issued by Pamela Scheininger and the NYC family courts eliminates my right to bear arms. The order states it is a federal crime to buy, possess, or transfer a handgun, rifle, shotgun, or firearm or ammunition while this order is in effect. I am being deprived of my right to bear arms without due process of law.

I am being deprived of my rights under the fourth amendment of the US Constitution because I have been subjected to 3 arrests without warrant by the NYPD. Each time I was I was also searched, and my body was seized without a warrant, and I was forced to go to central bookings. The first time I was arrested by officers Lavigat and Pepdjonovic of the 50th precinct at 3240 Netherlands Ave in the Bronx, I had fingerprints, retina scans, and mugshots taken without my consent, and was held against my will in central bookings which is an extremely dangerous place for days. One arrest occurred when officers from the NYPD arrived at my home located at 66 St. Nicholas Place in NY, at approximately 6a.m. banged on the door announced they had a warrant and would take the door off the hinges if necessary. They were lying they did not have a warrant. I was then arrested by Detective Kareem Anderson of the 50th precinct on or about 5/16/2024 for allegedly violating the same order of protection. These arrests deprived me of right to liberty.

I am being deprived of my rights under the 5th amendment to the US constitution as I have been deprived of the lives of my offspring. I have been deprived of the liberty to raise, know, and have, my offspring without due process of law by Pamela Scheininger, The NYPD, and The NYC family Courts. I am being deprived of my pursuit of happiness without due process of law. My confidential information, name, image, and likeness, as well as my biological and intellectual property has been taken for public use without just compensation. There is five year order of protection issued but none of the aggravating circumstances required were established.

I am being deprived of my rights under article 4 section 4 of the US Constitution because I am being denied a republican form of government.

I am being deprived of my rights under Article 3 Section 2 clause 1 of the US Constitution because I have not caused an injury in fact to anyone, but I am being deprived of my rights and subjected to cruel and unusual punishment. The family court hearing was non justiciable according to this article. There is no injury in fact; therefore, there is no standing or locus standi or corpus delicti.

I am being deprived of my rights under Article 3 Section 2 Clause 3 because Pamela Scheininger and the family court is alleging to have made findings of family violence, but this article clearly states that any criminal trials are to be by jury, so they are depriving me of this right. This clause also states that trial is to be held in the state where the alleged offense occurred, I was in the state of Georgia at the time of the alleged events.

I am being deprived of my rights under the sixth amendment to the US Constitution because the family court hearing was by telephone, depriving me of the right to a public trial. I was denied the right to an impartial jury. I was also denied the right to know the nature and cause of the charges against me by Pamela Scheininger and the NYC Family Court.

I am being deprived of my rights under the 7th amendment to the US constitution because 5 years of my offspring lives as well as their custody is certainly worth more than \$20 dollars, and I was deprived of my right to a trial by jury in the determination of custody, and in the issuance of the protective orders on 10/21/2022 by Pamela Scheininger and the NYC Family Courts.

I am being deprived of my rights under the 8th amendment to the US constitution because Pamela Scheininger, the NYC Family courts and the NYPD are disallowing me access to my offspring for five years, and that is cruel and unusual punishment. Pamela Scheininger and the NYC Family Courts taking custody of my offspring is an excessive fine, it constitutes torture.

I am being deprived of rights that I reserve as one of the living breathing beings, souls, or people under the 9th amendment to United States Constitution. I reserve the right to remain anonymous before the government. I reserve the right to be recognized as a human, and not be subjected to arbitrary arrest, or arbitrary interference in my private family life, or financial life. I reserve the right to raise my offspring according to laws of my GOD privately.

I am being deprived of my rights under the 13th amendment because all the previously mentioned and included deprivations has reduced my social status to slave without conviction of a crime, where I can be arrested simply for disobeying Pamela Scheininger's absurd orders not to associate with my own family. Certainly, this is not freedom. I am

being forced into serving the desires of Pamela Scheininger and the NYC Family court involuntarily, the order that I stay away from my own family is being enforced under the threat, duress, and coercion of arrest and imprisonment.

I am being deprived of my rights under the 14th amendment because the State of New York has created laws that bypass federally protected rights and privileges. I am also being deprived of equal protection and due process of the law, as custody was awarded to the mother of my offspring purely based on gender. The State of New York, its Subsidiaries, agents, employees, agents, contractors or representatives are depriving me of rights guaranteed by the United States constitution.

Summarily, on November 10, 2021, the mother of my son and daughter Patricia Delacruz filed a fraudulent and misleading petition for protection against me while I was a resident of Georgia. This petition was never properly served on me. Filing a criminal complaint or family court petition that is knowingly false is a crime, and that crime has not been investigated. She also filed a petition for full custody of our children, TN 07/03/2018 and AN 03/16/2021. Mrs. Delacruz made false allegations that I have the right to trial by jury to determine guilt or innocence thereof. This petition should have been dismissed as proper service of the petition was not procured after six months. I have been deprived of procedural due process, because not only was I not notified and given an opportunity to be heard. I was not afforded a trial by jury; however, Pamela Scheininger and the Family court has somehow found that I committed those offenses in violation of my right to a trial by jury in all criminal offenses according to article 4 section 4 and the 6th and 7th amendments of the United States Constitution. Pamela Scheininger then awarded full custody of my children to their mother awarding full custody without procedural due process constitutes kidnapping. Moreover, substantive due process dictates that State officers, agents, or employees don't have the right to violate my fundamental human rights, or fundamental liberty interests. My interests in my progeny are fundamental liberty interests and are not subject to government interference, prohibition, or regulation in any form. Pamela Scheininger court attorney/referee also placed an order of protection against me forcing me stay away from the school and home of my progeny, forcing me to refrain from having any communication with them by any means whatsoever. This order of protection issued by Pamela Scheininger on 10/21/2022 in connection to docket number 0-05764-21, although it has not been signed by a judge, or served on me, or returned to the clerk is being enforced by the NYPD by arresting me each time Mrs. Delacruz reports that I allegedly speak to my offspring. On August 27, 2023, Officers Lavigat and Pepdjonovic arrested me at 3240 Netherlands Ave in the Bronx without a warrant or probable cause for

allegedly violating the unlawful coram non judice unconstitutional order of protection issued by Pamela Scheininger of the NYC Family Court I was charged with criminal contempt and criminal interference those charges were dismissed on December 4, 2023. I was arrested again at my home on 5/14/2024 without a warrant or probable cause. I was charged with criminal contempt and child endangerment, and I was released from custody with mandatory visitation and telephone reporting to CASES otherwise I was threatened with going to Riker's Island to await trial. When I was released from law enforcement custody by the Manhattan Criminal Court on 5/15/2024, I was held for the Bronx Detectives and Kareem Anderson 6566 came and arrested me at 100 Centre Street for allegedly violating the same null, void, coram non judice, and unconstitutional order; However, the Bronx chose not to prosecute, and I was released from custody at Bronx central bookings mid-day on 5/16/2024.

The conduct of the individual defendants as described herein amounts to invasion of privacy, unlawful search and seizure, abuse of process, kidnapping, fabrication of evidence, deprivation of property without due process of law, conspiracy against rights, and malicious prosecution in violation of 42 U.S.C. 1983 and 18 U.S.C. 241, 242, and 245 with kidnapping enhancement. Pamela Scheininger only has consent authority, and I do not consent, and I have not consented to her authority. There was supposed to be a signed stipulation stating whether she could hear and report or hear and decide, and I never signed it. Pamela Scheininger is not a judge she has not attended Judicial Programs, so she has no authority to order a free person to do anything. There was no clear and convincing evidence submitted that I was a severe and imminent threat to anyone, as I was 1000 miles (about 1609.34 km) away in Georgia. There was no competent, clear, and convincing material evidence submitted during the fact-finding hearing that I am unfit as a parent. Moreover, I have a right to trial by jury before if I can be deprived of such liberty lawfully. The courts were physically closed. We were not able to be present in the courtroom. Material evidence could not be fairly evaluated. To justify the issuance of 5year order of protection requires "aggravating circumstances" none of which could have been truthfully substantiated. There is no stipulation that I consent to the proceedings. Good cause for aggravating circumstances must be stated on the record, whether good cause or consent, and the court must articulate the basis for its decision on the record. Default is not an option for proving aggravating circumstances. There has been no heightened scrutiny which is necessary whenever there is a termination, alteration, or limitation of parental rights.

I have been deprived of my rights under the 1st, 2nd, 4th, 5th, 6th, 7th, 8th, 9th, and 14th amendments to the United States Constitution. The officers and employees herein mentioned either participated, failed to supervise, or failed to intervene or take other action to remedy the

wrongs done to me in violation of 42 U.S.C. 1983 and 18 U.S.C. 241, 242, and 245 with kidnapping enhancement.

The City of New York directly caused the constitutional violations that I have suffered.

Upon information and belief, the City of New York, at all times relevant herein, was aware from petitions, and notices of claims, lawsuits, complaints filed with the City, and the City's own observations, that people employed in the Family Courts, the Department of Corrections and the NYPD including court attorneys, referees, judges, police officers, corrections officers involved in the current case are unfit officers or employees with the propensity to commit the acts alleged herein. Nevertheless, the city of New York exercised extreme indifference by failing to take remedial action. The city failed to properly professionally train, supervise, discipline, and retain officers and employees, and improperly retained and utilized them. Moreover, the city failed to properly thoroughly investigate previous complaints filed against the officers and employees.

The previously mentioned conduct by the City of New York violated my rights under 42 U.S.C. 1983, 1985, 1986 and the 1st, 2nd, 4th, 5th, 6th, 7th, 8th, 9th and 14th amendments to the United States Constitution and 18 U.S. Code 241, 18 U.S. Code 242, 18 U.S. Code 245

Because Pamela Scheininger and the officers involved were acting within the scope of their employment as members of the Family Court, Department of Corrections and NYPD respectively during the incidents in question the city of New York is vicariously liable under state law for false arrest, deprivations of rights without due process of law, deprivation of property without due process of law, deprivation of liberty without due process of law, assault, battery, kidnapping, false imprisonment, deprivation of rights under color of law invasion of privacy, intrusion upon seclusion, cruel and unusual punishment, dehumanization, public humiliation, and malicious prosecution.

Furthermore, the city is responsible for negligent training, discipline, supervision, and retention of officers and employees involved in the present case.

The City of New York's failure to properly train, supervise, discipline, or retain its Police and employees involved herein, constitutes acquiescence in and tolerance of ongoing invasions of privacy, intrusions upon seclusion, unconstitutional searches and seizures, false arrests, false detentions, uses of force, false allegations, fabrication of evidence, abuse of process, abuse of law, kidnapping, conspiracy against rights, deprivations of rights, property, and liberty under color of law, conspiracy against rights, and allowed the individual defendants to believe that they could with impunity, search, seize, imprison, humiliate, surveil, kidnap, arrest, subjugate, brutalize, terrorize, traumatize, and otherwise abuse me and my family.

I am requesting declaratory relief that states Pamela Scheiningers orders for protection and custody in file number 314060 Docket number 0-05764-21 are null and void or otherwise invalid, for coram non judice and unconstitutionality.

PRAYER FOR RELIEF

I am requesting actual damages of \$20,000,000 USD because the loss of my offspring has been extremely traumatic for me and my entire family. It has been life falteringly traumatic for me. I have been reduced to homelessness while trying to fight to regain my rights to my offspring. I have not been able to focus on anything but getting my children back for years, these years of my offsprings infancy and childhood are worth every penny, I cannot get back the time, the memories, my daughter will only take her first step once, say her first word once, and I missed that because of the actions of the defendants, and that is my price. I missed my sons first first day of school, and so many other experiences that would be shared between a father and son. My son is my Junior, so in addition to passing on my name to him, there are things in life that I need to teach him, and I am being disallowed, this is priceless stuff, this is the entire meaning of life for me. The false arrests have eliminated my ability to find work as Financial Services representative, and I was terminated from my previous position when they got notice of my arrest on 8/24/2023, I also have not been able to work in a career field that I have been in since 2004, with a lucrative business of my own. The actions of the defendants altered my life and my family for generations, and compensation, and damages should be for generations.

I am requesting \$60,000,000 US Dollars in treble damages treble damages are 3x the actual damages, the egregious nature of the actions of the defendants justifies the award of treble damages. The defendants have violated so many of my god given unalienable constitutional rights, and human rights that I feel like a slave.

I am requesting 20,000,000 US Dollars for punitive damages to deter the City and States of New York, The NYPD, The New York City Department of Corrections, The New York City Family Courts, and defendants named and yet to be named from ever engaging in these types of activities in the future. To force the City and States of New York to be more diligent in hiring, training, discipline, and supervision of its employees, and officers. These types of systematic deprivations are part of a habitual and routine enterprise of violating father's, men, and thus society. The removal of fathers from a young person's life is one of the most staggering blows a young person can be dealt, and this system routinely, wantonly, and unlawfully separates fathers from their family for myriad reasons, but it needs to stop. Hopefully, this will serve as a wakeup call to the City and States of New York, that The New

York City Family courts need to be modernized, and father's and men's rights need to be upheld protected and respected. The family is the base unit of society, and every step should be taken to keep families together, not break them a part. The deprivation of rights, public humiliation, negligent and intentional infliction of emotional distress, invasion of privacy, kidnapping, malicious prosecution, false arrest, cruel and unusual punishments need to cease for me and every other citizen of the United States whose only guilty of producing life. Let this be a step in the right direction, I have been tortured for years.